

1 Ann Hobart, Bar No. 019129  
2 Jordan Kendall, Bar No. 038647  
3 Assistant Attorneys General  
4 Arizona Attorney General's Office  
5 2005 N. Central Avenue  
6 Phoenix, Arizona 85004  
7 Telephone: (602) 542-8347  
8 (602) 542-7687  
9 Facsimile: (602) 542-7644  
10 Ann.Hobart@azag.gov  
11 Jordan.Kendall@azag.gov  
12 EmploymentLaw@azag.gov

13 Attorneys for Defendants State of Arizona,  
14 Michael R. Sheldon, Aaron Bowen,  
15 Lea'cher Carter, and Unique Coleman

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE DISTRICT OF ARIZONA**

18 Matthew Phillip Solan,  
19 Plaintiff,  
20 vs.

21 The State of Arizona; Jennifer L.  
22 Cunico; Michael R. Sheldon; Aaron  
23 Bowen, Calvin J. Flowers; Steven Kwoh;  
24 Kindra Ochoa, Lea'cher Carter, Unique  
25 Coleman; John Does 1-100; Jane Does 1-  
26 100; Black Corporations 1-10; and White  
27 Entities 1-10,  
28 Defendants.

Case No: CV-24-02061-JJT-DMF

**DEFENDANTS' RESPONSE TO  
PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION (DOC.  
17)**

29 Defendants the State of Arizona, Michael R. Sheldon, Aaron Bowen, Lea'cher  
30 Carter, and Unique Coleman hereby respond in opposition to Plaintiff's Motion for  
31 Preliminary Injunction ("Motion"). (Doc. 17.) The Court should deny the Motion  
32 because Plaintiff Matthew Solan has not shown that he is likely to prevail on the merits  
33 of his claims that Title II of the Americans with Disabilities Act ("ADA") and/or Section  
34 504 of the Rehabilitation Act ("Rehab Act") require the Arizona State Hospital ("ASH")

1 to admit the clone of Solan’s deceased service animal Foxy to live with him during his  
 2 commitment to the ASH Forensic Hospital and because he has failed to establish the  
 3 other elements for obtaining a preliminary injunction.

4 **I. Introduction.**

5 On March 12, 2020, Solan was convicted in the Coconino County Superior Court  
 6 of one count of aggravated assault and sentenced to a 7.5-year term of imprisonment in  
 7 the Arizona Department of Corrections, Rehabilitation & Reentry. (Doc. 8, at 3 n. 3.)  
 8 Because he has been diagnosed as Seriously Mentally Ill and was adjudicated Guilty  
 9 Except Insane, Solan was committed to ASH’s Forensic Hospital under the jurisdiction  
 10 of the Psychiatric Security Review Board. (*Id.*; Doc. 6 at 13, ¶ 56.) Solan was admitted  
 11 to ASH on April 1, 2020. (*Id.*)

12 Shortly following his admission, Solan asked to have his dog Foxy (from which  
 13 he had been separated in 2019 when he was arrested and placed in a detention facility)  
 14 live with him at ASH. (Doc. 6 at 14-15, ¶¶ 66-67.) ASH denied his request, citing  
 15 security and health and safety concerns, and administrative burden. (*Id.* at ¶ 67.) Solan  
 16 filed a lawsuit and Motion for Preliminary Injunction with this Court, *Solan v. Arizona*  
 17 *State Hospital*, CV-20-02209-PHX-JJT (DMF) (“CV-20-02209”), alleging that ASH’s  
 18 refusal to modify its policies and procedures to allow Foxy to live with him at the  
 19 forensic psychiatric hospital violated the ADA. On March 22, 2022, the Court granted  
 20 Solan’s motion and ordered ASH to conduct a particularized assessment to determine  
 21 whether reasonable modifications could be made to allow Foxy to live with Solan at  
 22 ASH “without fundamentally altering ASH’s services.” (Doc. 6 at 16, ¶ 76.)

23 On or about May 6, 2022, as the Court had ordered, ASH provided Solan a report  
 24 of its particularized assessment setting forth six general areas of concern that justified  
 25 denying his request to have Foxy live with him at ASH. (Doc. 6 at 17, ¶ 81 & 64-69  
 26 [Ex. A].) This Court previously had advised Solan that, if he was “again dissatisfied”  
 27 with ASH’s decision following the particularized assessment, he could “again move for  
 28 preliminary injunctive relief.” (CV-20-02209, Doc. 84, at 16.) Solan did not do so,

1 although by the time he received the particularized assessment report, he was represented  
2 by counsel. (Doc. 6 at 19, ¶ 93.) Solan learned that Foxy had passed away on July 13,  
3 2022. (*Id.* ¶ 94.) However, he did not stipulate to dismiss his case until January 26,  
4 2023. (CV-20-02209, Doc. 94.) The stipulation was to dismissal was with prejudice  
5 (*id.*) even though, by then, Solan had already arranged to have Foxy cloned (doc. 6 at 19,  
6 ¶ 97).

7 On November 9, 2023, Solan claims that Foxy was “reincarnated.” (Doc. 6 at 20,  
8 ¶ 105.) On June 13, 2024, he requested that Foxy’s clone be allowed to live with him at  
9 ASH. (*Id.* at 22, ¶ 117.) ASH denied this request, based on the same concerns that it  
10 had articulated in the May 2022 particularized assessment report. (*Id.* at 22-23, ¶ 123.)  
11 These concerns included that “based on [Solan’s] own personal statements, [his] past  
12 relationships and interactions with a ‘service animal’ have not only been counter-  
13 therapeutic, but also inappropriate (sexual in nature).” (*Id.* at 23, ¶ 124(a), & 86.)

14 On August 14, 2024, Solan filed this lawsuit complaining that ASH’s denial  
15 violated the ADA and the Rehab Act. (Doc. 1.) In the operative First Amended  
16 Complaint (“FAC”) filed on November 18, 2024, Solan alleged claims for false light  
17 invasion of privacy and defamation as well. (Doc. 6 at 50, 51.) These four claims  
18 survived screening under 28 § 1915(A) (doc. 8 at 20), and, on March 13, 2024, the  
19 remaining Defendants moved to dismiss them for failure to state a claim (doc. 15). Four  
20 days later, Solan filed the present Motion, asking this Court to order ASH to admit  
21 Foxy’s clone to live with him at the ASH Forensic Hospital during the pendency of his  
22 lawsuit.

23 The Court should deny Solan’s Motion because he has not shown that he is likely  
24 to succeed on the merits of his ADA and Rehab Act claims, for several reasons. First,  
25 having voluntarily dismissed CV-20-02209 with prejudice, Solan is collaterally estopped  
26 from arguing that the 2022 particularized assessment is invalid because it did not comply  
27 with the Court’s Order in Solan’s prior case. Second, Solan has no factual or legal basis  
28 to controvert Defendants’ reliance on the 2022 particularized assessment to deny his

1 current request to have Foxy's clone live with him at the ASH Forensic Hospital.  
 2 Finally, Solan's complaint that Foxy's clone is a therapy animal that should be allowed  
 3 to provide Animal Assisted Therapy to all Forensic Hospital patients does not support  
 4 his claim that she is a service animal who has been individually trained to perform work  
 5 or tasks related specifically to his psychiatric disabilities. Moreover, Solan has failed to  
 6 establish the other elements for obtaining a preliminary injunction.

7 **II. Solan Has Not Clearly Shown that He is Likely to Prevail on His Claim that**  
 8 **the ADA and the Rehab Act Require ASH to Allow Foxy's Clone to Live with**  
 9 **Him at the Forensic Hospital.**

10 "Preliminary injunctive relief is 'an extraordinary remedy that may only be  
 11 awarded upon a clear showing that the plaintiff is entitled to such relief.'" *Jones v.*  
 12 *Bonta*, 705 F. Supp. 3d 1121, 1130 (S.D. Cal. 2023) (quoting *Winter v. Nat. Res. Def.*  
 13 *Council, Inc.*, 555 U.S. 7, 22 (2008)). To obtain a preliminary injunction under Fed. R.  
 14 Civ. P. 65, a party must show "that he is likely to succeed on the merits, that he is likely  
 15 to suffer irreparable harm in the absence of preliminary relief, that the balance of equities  
 16 tips in his favor, and that an injunction is in the public interest." *Winter*, 555 U.S. at 20.  
 17 Solan's Motion does not come close to making such a showing.

18 When evaluating motions for preliminary injunction, courts in the Ninth Circuit  
 19 apply a sliding scale approach. *See Alliance for Wild Rockies v. Cottrell*, 632 F.3d 1127,  
 20 1131 (9th Cir. 2011). "Under this approach, the elements of the preliminary injunction  
 21 test are balanced and where a plaintiff can make a stronger showing of one element it  
 22 may offset a weaker showing of another." *Jones*, 705 F. Supp. 3d at 1130. However,  
 23 "[t]he first *Winter* factor, likelihood of success, is a threshold inquiry and is the most  
 24 important factor in any motion for a preliminary injunction." *Baird v. Bonta*, 81 F.4th  
 25 1036, 1042 (9th Cir. 2023).

26 Solan's Motion does not clear *Winter*'s threshold inquiry.  
 27  
 28

**A. Issue Preclusion Bars Solan’s Argument that ASH’s Particularized Assessment Is Invalid Because It Did Not Comply with the Court’s Order in CV-20-02209.**

According to Solan, Defendants cannot rely on the 2022 particularized assessment relating to Foxy to exclude her clone from ASH in 2025 because, he argues, the assessment did not comply with the Court’s order in CV-20-02209. (Doc. 17 at 7-8.) The issue preclusion doctrine bars this argument, however, because Solan explicitly requested that this Court dismiss CV-20-02209 with prejudice, and this Court granted that request. (CV-20-02209, Docs. 94 & 95.)

“The effect of a dismissal with prejudice is that it acts as a final judgment and cannot be revived or relitigated absent extraordinary circumstances.” *Newlin v Idaho Dep’t of Health & Welfare*, 2025 WL 622197, \*2 (D. Idaho Feb. 26, 2025) (citing *Zapata v. New York*, 502 U.S. 181, 185 (1991) (“A dismissal with prejudice terminates the action and precludes further litigation on the merits”); *Hells Canyon Pres. Council v. United States Forest Serv.*, 403 F.3d 683, 686 (9th Cir. 2005) (“Final judgment on the merits is synonymous with dismissal with prejudice.”) (cleaned up).) “The preclusive effect of a federal-court judgment is determined by federal common law.” *Taylor v. Sturgell*, 553 U.S. 880, 891 (2008). “Under federal common law, the elements of issue preclusion are: (1) there was a full and fair opportunity to litigate the issue in the previous action, (2) the issue was actually litigated in that action, (3) the issue was lost as a result of a final judgment in that action, and (4) the person against whom collateral estoppel is asserted in the present action was a party or in privity with a party in the previous action.” *In re Van Damme*, 651 B.R. 791, 808 (D. Nev. 2022).

Each of the elements of issue preclusion is satisfied in this case. One, Solan had a full and fair opportunity to litigate and, two, did litigate, whether Foxy’s exclusion from ASH violated the ADA. After granting Solan’s motion for preliminary injunction and ordering ASH to conduct a particularized assessment relating to Foxy, the Court even advised Solan that he could “again move for preliminary injunctive relief,” if he was “again dissatisfied” with the outcome of that that assessment. (CV-20-02209, Doc. 84,

1 at 16.) Three, Solan did not challenge ASH's compliance with the Court's preliminary  
 2 injunction Order while CV-20-02209 was pending, and he lost the issue when he  
 3 voluntarily stipulated to dismiss his prior case with prejudice. Four, Solan was the  
 4 Plaintiff in CV-20-02209 and is the Plaintiff in the present case. Accordingly, Solan is  
 5 collaterally estopped from arguing in this action that the 2022 particularized assessment  
 6 is invalid because it did not comply with the preliminary injunction Order in CV-20-  
 7 02209.

8 **B. Solan Has No Legal or Factual Basis to Controvert Defendants'**  
 9 **Reliance on the 2022 Particularized Assessment Relating to Foxy I to**  
 10 **Deny His Request to Have Foxy's Clone Live with Him at ASH in 2025.**

11 In denying Solan's request to have Foxy's clone live with him at the Forensic  
 12 Hospital, ASH invoked the particularized assessment that it had conducted of the same  
 13 request for Foxy in 2022. (Doc. 6 at 22-23, 86.) Similarly, Defendants relied on the  
 14 particularized assessment's findings and conclusions in moving to dismiss Solan's ADA  
 15 and Rehab Act claims in the present matter. (Doc. 15 at 5-14.) Solan asserts that  
 16 Defendants' reliance is misplaced because the particularized assessment "was from  
 17 another administration, and for a different service animal." (Doc. 17 at 7.) But he fails  
 18 to explain what difference that makes. And he can't. The reasons to deny Solan's  
 19 request to have a service animal live with him at the Forensic Hospital are the same in  
 20 2025 as they were in 2022. Solan's scattershot attempts to controvert ASH's  
 21 particularized assessment are superficial, conclusory, and ineffectual.

22 For example, Solan accuses Defendants of attempting to "mislead" the Court by  
 23 not citing the qualification to the requirement under 28 C.F.R. § 35.136(d) that service  
 24 animals be tethered. (Doc. 17 at 11.) That is, "[a] service animal shall have a harness,  
 25 leash, or other tether, *unless either the handler is unable because of a disability to use a*  
 26 *harness, leash or other tether, or the use of a harness, leash or other tether would*  
 27 *interfere with the service animal's safe, effective performance of work or tasks, in*  
 28 *which case the service animal must be otherwise under the handler's control (e.g.,*

1 ***voice control, signals or other effective means.)***” (*Id.* [citing 28 C.F.R. § 35.136(d)].)  
 2 But Solan fails to explain why he would be unable to use a tether because of a disability  
 3 or why using a tether would interfere with Foxy’s clone’s ability to safely and effectively  
 4 perform work or tasks for Solan. Moreover, he fails to explain what work or tasks  
 5 Foxy’s clone was individually trained to do for him, much less how that training was  
 6 accomplished. Accordingly, he has failed to show that she is a service animal. *See C.L.*  
 7 *v. Del Amo Hospital*, 992 F.3d 901, 910 (9th Cir. 2021) (“The ADA’s implementing  
 8 regulations define a service animal as ‘any dog that is individually trained to do work or  
 9 perform tasks for the benefit of an individual with a disability,’ including a psychiatric  
 10 disability, where the work or tasks are ‘directly related to the individual’s disability.’ 28  
 11 CFR § 36.104.”). These deficiencies are fatal to Solan’s Motion. “[A] well-trained  
 12 companion animal that happens to alleviate a person’s anxiety,” which Foxy’s clone may  
 13 be, is not a service animal protected by the ADA. (*Id.* at 911.)

14 Ironically, *Del Amo* is one of three cases that Solan cites for the broad (and  
 15 inaccurate) proposition that “courts have repeatedly granted injunctions, including  
 16 preliminary injunctions, mandating service animal accommodations for patients residing  
 17 in locked psychiatric wards.” (Doc. 17 at 5.) Contrary to Solan’s Motion, *Del Amo* did  
 18 not involve residency in a locked psychiatric facility or an injunction of any kind. It  
 19 involved a plaintiff who on multiple occasions voluntarily sought inpatient treatment for  
 20 PTSD from Del Amo and each time asked to be accompanied by her service dog. 992  
 21 F.3d at 907. Each time, Del Amo denied the request because clinicians determined that  
 22 the dog’s presence would interfere with the plaintiff’s therapy. *Id.*

23 Following a bench trial, the district court entered judgment for Del Amo on the  
 24 grounds that plaintiff had not shown that her dog, whom she had personally trained to  
 25 perform work related to her PTSD, was a service animal. *Id.* at 908. The court did not  
 26 reach the question of whether Del Amo had proven its affirmative defense that allowing  
 27 the dog to participate in plaintiff’s hospitalization would “fundamentally alter” the  
 28 psychiatric services that it offered and therefore was not required under the ADA. *Id.*



1 On appeal, the Ninth Circuit found that, as a matter of first impression, the district court  
2 had erred as a matter of law by requiring plaintiff's dog to meet formal certification  
3 standards in order to qualify as a "service dog" under the ADA, and remanded the case  
4 to the district court for further proceedings consistent with its opinion. 992 F.3d at 915.

5 *Del Amo* is no help to Solan because ASH has never disputed that Foxy, whom  
6 Solan personally trained, was a service dog. Moreover, he has not alleged facts to  
7 suggest that, like Foxy, he personally trained Foxy's clone to perform tasks or work for  
8 him that are directly related to his psychiatric disabilities. Accordingly, *Del Amo*  
9 provides no support for the injunction that Solan seeks with this Motion, which is an  
10 Order requiring that ASH allow Foxy's clone to live with him at the Forensic Hospital  
11 "during the pendency of this suit." (Doc. 17 at 17.)

12 Solan's second case is *Tamara v. El Camino Hosp.*, 964 F. Supp. 2d 1077 (N.D.  
13 Cal. 2013). (Doc. 17 at 5.) *Tamara* did involve a brief (13-day) stay in a "locked  
14 psychiatric ward," but the Plaintiff in that case used a service dog for "independence and  
15 mobility" following back surgeries, not to perform work or tasks related to her  
16 psychiatric disabilities. *Id.* at 1079-80. Therefore, unlike in *Del Amo* (or this case),  
17 whether the use of plaintiff's service animal would be countertherapeutic or interfere  
18 with the psychiatric services the hospital provided was not at issue. Rather, plaintiff  
19 contested the hospital's blanket ban on service animals in certain restricted areas,  
20 including the hospital's psychiatric ward, based on health and safety concerns. *Id.* at  
21 1081.

22 Plaintiff moved for a preliminary injunction requiring El Camino Hospital to  
23 change its policy to admit service dogs throughout the facility unless it has "substantial  
24 evidence that a dog poses a 'direct threat' to the health and safety of others that cannot  
25 be mitigated by reasonable modifications of its policies, practices, or procedures." *Id.*  
26 The district court granted plaintiff's motion and, pending resolution of the case, issued  
27 an order precluding El Camino Hospital from automatically excluding service animals  
28 from its psychiatric ward and requiring that it conduct "individualized assessments . . . to



determine whether a specific service animal poses a direct threat to the health or safety of others based on reasonable judgment that relies on current medical knowledge or the best available objective evidence.” *Id.* at 1088. The court also made clear, however, that “[n]othing in this order should be construed as necessarily saying that [plaintiff’s] service dog must be allowed in the psychiatric ward.” *Id.* Accordingly, *Tamara* lends no support for an injunction mandating that Foxy’s clone be allowed to accompany Solan at ASH’s Forensic Hospital at this early phase of the litigation.

Solan’s third case is the Court’s March 22, 2022, Order in CV-20-02209 (doc. 84). (Doc. 17 at 5.) As previously discussed, Solan is collaterally estopped from relying on this Order in the present action. (*See* Section I.A, above.) Defendants note, however, that although this Court followed the reasoning in *Tamara* to require ASH to conduct a particularized assessment of Solan’s request, the Court also expressly declined to mandate that Foxy be allowed to live with him at the Forensic Hospital. (CV-20-02209, Doc. 84 at 15-18.) Defendants having performed painstakingly the particularized assessment that this Court ordered, and Solan having failed to timely object to that assessment before agreeing to dismiss CV-20-02209 with prejudice, the Court’s March 22, 2022, Order in the previous action provides no support for mandating that Foxy’s clone, which Solan has not even shown is a service animal, to accompany him at ASH during the pendency of this action.

**C. Solan’s Argument that Foxy’s Clone Is a Therapy Animal Who Should Be Allowed to Visit the Forensic Hospital Does Not Support his Claim that She Is a Service Animal Who Must Be Allowed to Reside with Him There.**

Solan devotes a significant portion of his Motion to complaining that ASH is not (1) providing him with Animal-Assisted Therapy (“AAT”) as required under his Individualized Treatment and Discharge Plan (“ITDP” or “Plan”); or (2) allowing Foxy’s clone to “provid[e] AAT services to all the forensic patients at ASH.” (Doc. 17 at 3-4, 16.) Solan has not raised either of these claims in his operative First Amended Complaint. (Doc. 6.) Moreover, both of them are at odds with his demand for relief in

1 this Motion, which is predicated on the assumption that Foxy’s clone is a service animal  
 2 (not a therapy dog) who has been individually trained to perform tasks or work for Solan  
 3 specifically.

4 First, while in the summer of 2021, Solan succeeded through litigation in having  
 5 “ASH animal services therapy, along with an explanation of its availability or  
 6 unavailability at this time,” added to his ITDP, he failed to have “the issue of a ‘personal  
 7 service dog,’” which at the time was “under litigation” in CV-20-02209, added to the  
 8 Plan. (Doc. 17 at 60-61.) Accordingly, the administrative law judge clearly  
 9 distinguished between “ASH animal services therapy” on the one hand and Solan’s  
 10 “personal service dog” on the other. The former would be appropriate when it became  
 11 available; the second expressly would not be required.

12 Second, despite Solan’s assertion that “ASH has a therapy dog they are refusing  
 13 to utilize,” Foxy’s clone and her “interim caretaker, Joseph Cowsert” were not qualified  
 14 to provide AAT as that term is defined in ASH’s Animal Assisted Activities & Animal  
 15 Assisted Therapy policy (“the Policy”). (Doc. 17 at 3, 117.) According to the Policy,  
 16 “AAT is directed and/or delivered by a health/human service professional with  
 17 specialized expertise, and within the scope of practice of his/her profession.” (*Id.* at  
 18 117.) Solan has not alleged that Cowsert is a health or human services professional with  
 19 specialized expertise, and Cowsert has not claimed otherwise. Instead, in a February 6,  
 20 2025, memorandum to the Director of ASH’s Rehab Services, he identified himself as “a  
 21 manager for the Fox Ranch Company” and offered to provide, with Foxy’s clone,  
 22 “volunteer animal therapy services to the patients of [ASH’s] forensic campus.” (Doc.  
 23 17, at 70.) In other words, he is offering to provide Animal-Assisted Activity (“AAA”) as  
 24 that term is defined in the Policy, not AAT. Specifically, “AAA provides  
 25 opportunities for motivational, educational, recreational and/or therapeutic benefits to  
 26 enhance quality of life. AAA is delivered in a variety of environments by specially  
 27 trained professional, paraprofessionals, and/or **volunteers**, in association with animals  
 28 that meet specific criteria.” (*Id.* at 117 [emphasis added].) In short, Solan fails not only

1 to establish that Foxy’s clone is a service animal but also that she and Cowsert are a “Pet  
2 Partner Team” qualified to provide AAT under the Policy. (*Id.*)

3 **III. Solan Has Not Established that Denying This Motion Would Likely Lead to**  
4 **Irreparable Harm, that the Requested Relief Is in the Public Interest or that**  
5 **the Balance of Equities Tips in His Favor.**

6 As discussed above, Solan has failed to establish the threshold element for  
7 obtaining the preliminary injunction he seeks, i.e., likelihood of success on the merits of  
8 his ADA and Rehab Act claims. Solan has also failed to establish the other elements for  
9 obtaining preliminary injunctive relief. He asserts that “[d]eprivation . . . of a service  
10 animal is *per se* irreparable harm.” (Doc. 17 at 13.) But that assumes that Foxy’s clone  
11 is a service animal, which he has not established. He also asserts that it is “always in the  
12 public interest to prevent the violation of a party’s constitutional rights.” (*Id.* at 15  
13 (internal quotation omitted.) The rights that he purports to vindicate are statutory,  
14 however, not constitutional, and he has failed to establish the likelihood that they have  
15 been violated. His balancing of the “minor administrative inconvenience required by  
16 law” that Defendants will suffer if Foxy’s clone is allowed to live with Solan at the  
17 Forensic Hospital, against the “unnecessarily prolonged hospitalization and protracted  
18 involvement in the criminal justice system” that he will continue to suffer if she is not,  
19 assumes a likelihood of success on the merits of his ADA and Rehab Act claims that he  
20 has not established and reflects a fundamental failure to the consequences of his own  
21 actions and choices.

22 **Conclusion**

23 For the foregoing reasons, Defendants respectfully request that the Court deny  
24 Plaintiff’s Motion for Preliminary Injunction. (Doc. 17.)

1 Respectfully submitted this 18th day of April, 2025.

2 Arizona Attorney General's Office

3 /s/ Ann Hobart

4 Ann Hobart  
5 Jordan Kendall  
6 Assistant Attorneys General  
Attorneys for Defendants

7 I certify that I electronically transmitted  
8 the attached document to the Clerk's Office  
9 using the CM/ECF System for filing this  
10 18th day of April, 2025.

11 COPY emailed this 18th day  
and mailed the 21st day of April, 2025, to:

12 Matthew P. Solan  
13 c/o Arizona State Hospital  
14 501 N. 24<sup>th</sup> Street  
Phoenix, Arizona 85008-6056  
15 legal@fox-ranch.com  
16 Plaintiff

17 COPY of the foregoing to be mailed on the  
18 21st day of April, 2025, to:

19 The Honorable Deborah M. Fine  
20 U.S. District Court, Suite 321  
21 401 W. Washington Street, SPC 15  
22 Phoenix, AZ 85003-2120

23 /s/ Ann Hobart